

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

Louis Carl Jemison III,
FCC Petersburg (med)
P.O.Box 90043
Petersburg, Virginia
23804
plaintiff,

.v.

DETECTIVE JAMAL ANSARI,
c/o Cleveland Division of Police
1300 Ontario Street
Cleveland, Ohio 44113

DETECTIVE ELBIN NEGRON,
c/o Cleveland Division of Police
1300 Ontario Street
Cleveland, Ohio 44113

DETECTIVE LEE LUCAS,
FEDERAL UNITED STATES
DRUG ENFORCEMENT ADMINISTRATION
Washington, DC 20537

MAGISTRATE JUDGE NANCY VECCHIARELLI,
UNITED STATES COURTS
1 Columbus Cir. NE
Washington, DC 20544

DEPUTY TONY GARDNER,
UNITED STATES MARSHAL SERVICE
600 Army Navy Dr. Crystal Sq. 111
Arlington, Virginia 22202

defendant(s).

CASE NO:

COMPLAINT

1:09CV00844

JUDGE NUGENT

MAG. JUDGE PERELMAN

JURISDICTION

1. This Honorable Court has jurisdiction in this matter pursuant to Title 42 U.S.C. §1987 and Title 18 U.S.C. §3231

VENUE

2. Venue is proper in this matter pursuant to Title 28 U.S.C. §1391(e) and Title 18 U.S.C. §3232

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FACTUAL BACKGROUND

3. I the Undersigned complaintant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 11, 2006 in Cuyahoga County, in the Northern District of Ohio, defendant(s) NEGRON, ANSARI and LUCAS, acting under color of law, did conspire to injure, oppress, threaten or intimidate plaintiff in the free exercise or enjoyment of his right(s) or privilege(s) secured to him by the Constitution or the laws of the United States, or because of his having so exercised his right to do the same and did knowingly and willfully conceal by scheme or trick a material fact/fact(s); make materially false, fictitious or fraudulent statement(s) or representation(s); or make or use a false writing or document knowing the same to contain materially false, fictitious or fraudulent statement(s) or entry (ies) in violation of Title 18 U.S.C. §§ 241, 1001 a(1), (2) and (3).

4. On or about August 31, 2006 in Cuyahoga County, in the Northern District of Ohio, defendant(s) ANSARI and LUCAS, acting under color of law, did unlawfully seize, confine, kidnap, carry away or hold plaintiff with the intent of plaintiff being sold into involuntary servitude, or brought plaintiff in the United States so held, in violation of Title 18 U.S.C. §§ 1201a(2), 1583 and 1584.

5. On or about February 28, 2007 in Cuyahoga County, in the Northern District of Ohio, defendant(s) VECCHIARELLI and GARDNER, acting under color of law, did conspire to injure, oppress, threaten or intimidate plaintiff in the free exercise or enjoyment of his

right(s) and privilege(s) secured to him by the Constituion or laws of the United States, or because of his having so exercised his right to do the same and did knowingly and willfully conceal, by scheme or trick a material fact/fact(s); make materially false, fictitious or fraudulent statement(s) or representation(s); or use a false writing or document knowing the same to contain materially false, fictitious or fraudulent statement(s) or entry(ies), in violation of Title 18U.S.C. §§241 and 1001a(1),(2) and (3).

7. All defendant(s) acted in their personal capacities at the time of the events alleged herein. All defendant(s) herein are sued in their personal capacities, i.e., in their individual capacities and not their official capacities.

8. Defendant ANSARI was a detective with the City of Cleveland Division of Police at the time of the events alleged herein. On information and belief, he arrested plaintiff on behalf of the federal Drug Enforcement Administration (DEA).

9. Defendant LUCAS was an agent with the federal Drug Enforcement Administration at the time of the events alleged herein. On information and belief, he arrested plaintiff on behalf of the federal Drug Enforcement Administration (DEA).

10.) Defendant NEGRON was a detective with the City of Cleveland at the time of the events alleged herein. On information and belief, he acted in the course and futherance of his relationship with the DEA.

11. Defendant VECCHIARELLI was a U.S. Magistrate Judge at the time of the events alleged herein. At all times material herein defendant VECCHIARELLI was acting in the course, scope and furtherance of her employment by the United States Courts.

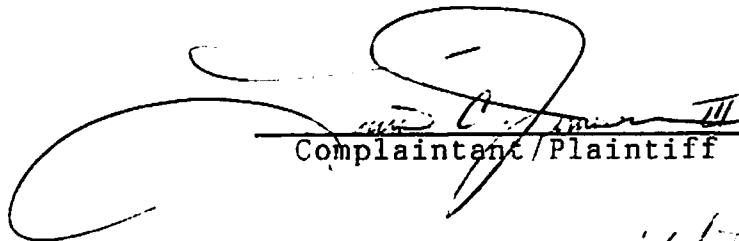
12. On information and belief defendant ANSARI was acting in the scope, course and furtherance of his relationship with the DEA.

13. Defendant GARDNER was a deputy with the U.S. Marshals Service at the time of the events alleged herein. On information and belief, he was acting in the scope, course and furtherance of his employment by the U.S. Marshals Service.

14. At all times material herein, all defendants were acting under color of law.

15. Plaintiff was a (natural person) and native born American; is not now and has never been a citizen of the United States.

16. I further state that I am the complaintant/plaintiff and that this complaint is based on the following facts; Refer to attached Affidavit.



Complainant/Plaintiff

Sworn to before me and subscribed in my presence,

at

CLEVELAND, OHIO

~~Notary Public for the State of Ohio~~
My commission expires Oct 13, 2009

14771 DPO/OK APRIL 2009

Authorized Officer